IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO AUG 28 AM 11: 16
EASTERN DIVISION

UNITED STATES OF AMERICA,	) CASE NO. 18 CLEVE PID 485
Plaintiff,	) MAGISTRATE JUDGE JONATHAN D. ) GREENBERG
V.	
TAMMY K. LACQUA,	) <u>MOTION TO SEAL INDICTMENT</u>
Defendant.	<b>)</b>

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney, and Brian McDonough Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): Risk of flight.

The government further requests this Court to order that an Assistant United

States Attorney of the Criminal Division of the United States Attorney's Office for the Northern

District of Ohio may obtain, upon request, a certified copy of this indictment should the

defendant be located in another judicial district and a certified copy of this indictment is needed

for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

By:

Brian McDonough (OH: 0072954)

Assistant United States Attorney

United States Court House

801 West Superior Avenue, Suite 400

Cleveland, OH 44113

(216) 622-3965

(216) 522-2403 (facsimile)

Brian.McDonough@usdoj.gov